

RE: RM 11346

Mr. Murray Green, K3BEQ, makes a case for changing the interval from 10 minutes to 30 minutes between identification. I concur in principle. I encourage the FCC to examine the viability of increasing the interval. In my experience, amateur radio operators “over-ID”. In some cases, it helps ensure effective communication flow. In other cases, it is simply wasted air time that could be better utilized. Pure lack of identification is rare and is usually the scenario where an operator didn’t provide his/her call sign identification at the beginning of a conversation due to voice familiarity with the other party.

The key to addressing the issue presented in this petition is to provide balance and consistency without adding confusion to the identification requirements. One approach is to look at what is required in other licensed services for the determination of reasonableness. Mr. Green made that case. I am expanding on that approach. Each service has peculiarities. I have examined some more of the services in this paper. The examination is not exhaustive but may provide some insight to what is required in other services. I do not deal with all exceptions or every situation. I also excluded Broadcasting services defined by part 93 and part 94. The identification requirement in those cases is most often hourly. Amateur Radio Service is not a Broadcasting service. Here’s a summary:

47 CFR Part	Section	ID at Beginning?	ID at Interval?	ID at End?
Part 5	Sec. 5.115 Station identification		30 minutes	
Part 22	Sec. 22.313 Station identification		hourly or	upon completion of the first transmission
Part 23	Sec. 23.37 Station identification	Yes	hourly	Yes
Part 80 - Subpart C	Sec. 80.99 Radiotelegraph station identification.		20 minutes	
Part 80 - Subpart C	Sec. 80.102 Radiotelephone station identification.	Yes	15 minutes	Yes
Part 80 - Subpart K	Sec. 80.519 Station identification.	yes	15 minutes	yes
Part 80 - Subpart X	Sec. 80.1181 Station identification.	yes	15 minutes	yes
Part 90 - Subpart N	Sec. 90.425 Station identification	yes	15 minutes (30 minutes in Public Safety Pool)	yes
Part 90 - Subpart S	Sec. 90.647 Station identification		30 minutes	

Part 90 - Subpart T	Sec. 90.735 Station identification		30 minutes	
Part 95 - Subpart A_General Mobile Radio Service (GMRS)	Sec. 95.119 Station identification.		15 minutes	Yes
Part 97 - Subpart B_Station Operation Standards	Sec. 97.119 Station identification.	No station may transmit unidentified communications or signals, or transmit as the station call sign, any call sign not authorized to the station.	10 minutes	Yes

In comparing the services listed in the table, one could conclude that nearly every service's rules require an identification at the beginning of transmission and at the end of transmission. That would seem to be intuitive.

However, the interval between identification varies from 10 minutes up to 30 minutes. The rationale may be unique to each service. One could also conclude that the Amateur Radio Service has a requirement for more frequent identification than the other services listed. In many cases this is 2, 3, or 6 times more frequent. The rationale for this emphasis on more frequent identification in the Amateur Radio Service is not so intuitive.

Mr. Green makes an effective case for 30 minute identification intervals. If the FCC will not expand the interval from 10 minutes to 30 minutes, then an expansion to 15 or 20 minutes would seem reasonable and consistent with the radio services mentioned in this paper. This will also help where licensed operators are providing emergency communications services and may need to ensure identification requirements are assured in more than one service.

Respectfully submitted,

Earl

Amateur Extra Class License, N8KBR

General Radiotelephone Operator License #PG00015987